

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

**IN RE BARD IVC FILTERS PRODUCT  
LIABILITY LITIGATION**

Civil Action No. 2:15-MD-02641-PHX-DGC  
MDL No. 2641

This Document Relates to:  
Pamela Robinson,  
2:19-cv-03041-DGC

**STIPULATION OF DISMISSAL WITH PREJUDICE**

COMES NOW, Plaintiff, Pamela Robinson, and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. ("Defendants"), and file this Stipulation of Dismissal with Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff and Defendants hereby stipulate to the dismissal of the above-captioned case with prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the above referenced case in its entirety with prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully Submitted,

/s/ William Barfield

William "Bill" Barfield  
TX Bar No. 24031725  
bill@mcdonaldworley.com  
Scott Fraser  
TX State Bar No. 24093452  
scott@mcdonaldworley.com  
1770 St. James Place, Suite 100  
Houston, TX 77056  
Telephone: (713) 523-5500 (Telephone)  
Facsimile: (713) 523-5501 (Facsimile)

*Attorneys for Plaintiff*

*/s/ Richard B. North*

Richard B. North, Jr., GA Bar #545599

**Nelson Mullins Riley & Scarborough, LLP**

2017 17th St. NW, Suite 1700

Atlanta, GA 30363

Telephone: (404) 322-6000

Facsimile: (404) 322-6050

Email: Richard.north@nelsonmullins.com

*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15<sup>th</sup> day of June, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all counsel of record and other CM/ECF participants.

/s/William Barfield